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9 Attorneys for United States of America

10
11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

No. 08-08-02331 JL

15 v.

16 APPROXIMATELY \$104,994 IN UNITED
17 STATES CURRENCY,

18 Defendant.

STIPULATION FOR AN ADDITIONAL
STAY PROCEEDING PURSUANT TO 18
U.S.C. § 981(g) and ~~PROPOSED~~ ORDER

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21 IT IS HEREBY STIPULATED by and between plaintiff United States of America and claimant
22 Todd Dunphy, through undersigned counsel, that this action be stayed pursuant to 18 U.S.C. § 981(g) and
23 21 U.S.C. § 881(i).

24 Claimant Todd Dunphy is currently the subject of a related criminal investigation in Hawaii. The
25 allegations in the forfeiture complaint are based, in large part, on the allegations at issue in the related
26 criminal investigation. Both parties have talked to the U.S. Attorney's Office in Hawaii, and understand
27 that the related criminal case will be indicted in the next 60 days. Consequently, the parties agree that a
28 stay in the forfeiture proceeding for 60 days is appropriate in order for the parties to evaluate

1 the issues to be raised in the pending indictment and to determine how that criminal proceeding will affect
2 the present case.

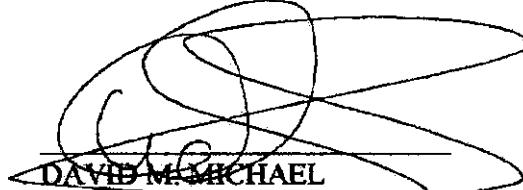
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4 IT IS SO STIPULATED:

JOSEPH P. RUSSONIELLO
United States Attorney

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7 Dated: August 6, 2009


DAVID COUNTRYMAN
Assistant United States Attorney

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10
11 Dated: August 6, 2009


DAVID M. MICHAEL
Attorney for Claimant
Todd Dunphy.

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15 **ORDER GRANTING STAY**

16 UPON CONSIDERATION of the Stipulation to Stay, the entire record, and for good
17 cause shown, it is by the Court on this 7th day of August, 2009

18 ORDERED that the instant case be, and hereby is, STAYED, until October 21,
19 2009, at 10:30 a.m. pursuant to 18 U.S.C. § 981(g).

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22 HONORABLE JAMES LARSON
United States Magistrate Judge